

UNITED STATES BANKRUPTCY COURT
DISTRICT OF MASSACHUSETTS

In Re:

**John Malone,
Debtor**

**Chapter 13
Case No. 24-10885**

**RESPONSE TO BANK OF NEW YORK MELLON'S RENEWED LIMITED
OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN**

Now comes the Debtor and responds to Bank of New York's Renewed Limited Objection to Confirmation of Debtor's Second Amended Chapter 13 Plan. In support thereof the Debtor states as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.
6. Admitted that Debtor's Plan does not provide for adequate protection payments, but Debtor has filed a Motion to Sell which provides for Bank of New York's mortgage to be paid in full, including pre and post-petition arrears.
10. Neither admitted nor denied as no response is required.

Wherefore, the Debtor requests the Court find as follows:

1. New York's Renewed Limited Objection be denied.
2. For such other relief as the Court deems just.

Debtor,
by his attorney,

Dated: November 18, 2025

/s/ John Ullian
John Ullian, Esq. BBO# 542786
Amy Puliafico, Esq. BBO# 682332
The Law Firm of Ullian & Associates, P.C.
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Braintree, MA 02184
(781) 848-5980

CERTIFICATE OF SERVICE

I, John Ullian, hereby certify under the pains and penalties of perjury that I served the **RESPONSE TO BANK OF NEW YORK MELLON'S RENEWED LIMITED OBJECTION TO CONFIRMATION OF DEBTOR'S CHAPTER 13 PLAN** by ECF or by mailing a copy of same, postage prepaid, to the following interested parties:

Richard King
Office of the US Trustee
J.W. McCormack Post Office & Courthouse
5 Post Office Sq., 10th Fl, Suite 1000
Boston, MA 02109

Carolyn Bankowski
Chapter 13 Trustee Boston
P. O. Box 8250
Boston, MA 02114

John Malone
28 Savin Hill Avenue
Dorchester, MA 02125

The Bank of New York Mellon
Marcus Pratt
Korde & Associates, P.C.
900 Chelmsford Street, Suite 3102
Lowell, MA 01851

Dated: November 18, 2025

/s/ John Ullian
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